

*Law Offices of
Jonathan E. Neuman, Esq.
176-25 Union Turnpike, Suite 230
Fresh Meadows, NY 11366
(347) 450-6710
FAX (718) 228-3689*

**Jonathan E. Neuman, Esq.
Attorney & Counselor at Law**

**Leslie Martin, Esq.
Of Counsel**

May 10, 2021

Via: ECF

Honorable Victor Marrero, U.S.D.J.
United States District Court Southern District of New York
500 Pearl St., Courtroom: 15B
New York, NY 10007-1312

USDC SDNY
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**Re: Compass Productions International LLC v. Charter Communications, Inc.
1:18-cv-12296-VM-BCM**

Honorable Judge Marrero:

My firm represents the Plaintiff, Compass Productions International LLC.

Pursuant to Your Honor's Individual Rules of Practice II.H., I write respectfully to request that that Plaintiff's Response to Defendant's Statement of Material Facts together with certain exhibits attached thereto, be sealed, from the public docket partially or in full as appropriate, in order to maintain the confidentiality of certain sensitive information. The confidential information sought to be sealed may be accessed by both Parties in this case.

This request is made for the same reasons as those set forth in Charter's letter motion dated April 9, 2021. Plaintiff respectfully requests permission to file portions of its Response as redacted, as well as portions of Exhibits E, H, I, K, and L, which are a number of the deposition transcripts, portions of which contain confidential or sensitive information that have been redacted at Defendant's request. Additionally, pursuant to the Parties' January 9, 2020 Protective Order (ECF 30), Plaintiff requests permission to file Exhibits O through II under seal, again, for the same reasons as set forth in Charter's letter motion dated April 9, 2021.

For these reasons, Compass respectfully requests that the Court permit the continued sealing.

Respectfully submitted,


Jonathan E. Neuman, Esq.

SO ORDERED.

5/12/2021

DATE


VICTOR MARRERO, U.S.D.J.